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13 | Sunil Kumar, Ph.D.

IN THE UNITED STATES

**IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

SUNIL KUMAR, Ph. D  
PRAVEEN SINHA, Ph. D.,

17

Plaintiffs,

18

v.

19 DR. JOLENE KOESTER, in her official  
20 capacity as Chancellor of California State  
University,

21 || Defendant.

Case No. 2:22-CV-07550-RGK-MAA

**DECLARATION OF ALBERTO M.  
LONGO IN SUPPORT OF  
PLAINTIFFS' OPENING BRIEF**

Judge: R. Gary Klausner  
Trial: October 24, 2023  
(on the briefs)

## **DECLARATION OF ALBERTO M. LONGO**

I, Alberto M. Longo, do hereby state and declare as follows:

1. I am an attorney at law duly licensed to practice law in the Commonwealth of Pennsylvania and State of New Jersey. I am an associate at the law firm of Fox Rothschild LLP and am admitted *pro hac vice* in this proceeding. I submit this declaration in support of Plaintiffs' Opening Brief. I have personal knowledge of the matters contained in this declaration and, if called and sworn as a witness, I could and would competently testify to all the matters contained herein.

9       2. Attached hereto as **Exhibit A** is a true and correct copy of the California  
10 State University (“CSU”) Policy Prohibiting Discrimination, Harassment, Sexual  
11 Exploitation, Dating Violence, Domestic Violence, Stalking, and Retaliation (the  
12 “Policy”), which was produced by Defendant in this case bearing Bates label  
13 CSU000582-000671.

14       3. Attached hereto as **Exhibit B** is a true and correct copy of selected pages  
15 from the deposition of Laura Anson (“Anson Tr.”), Defendant’s designee, conducted  
16 on August 4, 2023 for use in this action.

17       4. Attached hereto as **Exhibit C** is a true and correct copy of the California  
18 Faculty Association’s (“CFA”) Resolution in Support of Adding Caste as a Protected  
19 Category (“CFA Resolution”), which is publicly available for viewing and  
20 downloading on the California Faculty Association Website.<sup>1</sup> See  
21 <https://www.calfac.org/wp->

22 [content/uploads/2021/10/caste\\_resolution\\_sponsorbyAPIDA\\_revision10.10.21.pdf](content/uploads/2021/10/caste_resolution_sponsorbyAPIDA_revision10.10.21.pdf)

23       5. Attached hereto as **Exhibit D** is a true and correct copy of the California  
24 State Student Association’s (“CSSA”) Resolution Calling for CSU to Include Caste in  
25 Anti-Discrimination Policy (“CSSA Resolution”), which was produced by Defendant  
26 in this case bearing Bates label CSU001296-001299.

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<sup>28</sup> <sup>1</sup> The CFA Resolution is also attached as Exhibit D to Plaintiffs' Complaint (Dkt. No. 1-1).

1       6. Attached hereto as **Exhibit E** is a true and correct copy of the California  
2 Polytechnic State University Resolution (“Cal Poly Resolution”), which was produced  
3 by Defendant in this case bearing Bates label CSU001217-001219.

4       7. Attached hereto as **Exhibit F** is a true and correct copy of selected pages  
5 from the deposition of Plaintiff, Professor Praveen Sinha (“Sinha Tr.”), conducted on  
6 August 11, 2023 for use in this action.

7       8. Attached hereto as **Exhibit G** is a true and correct copy of a “Q&A” for  
8 the inclusion of caste in the Policy, which was produced by Defendant in this case  
9 bearing Bates label CSU000009.

10       9. Attached hereto as **Exhibit H** is a true and correct copy of a January 18,  
11 2022 Equality Labs Press Release, which was produced by Defendant in this case  
12 bearing Bates label CSU001401-001412.

13        10. Attached hereto as **Exhibit I** is a true and correct copy of an article written  
14 by Nani Walker, titled *Cal. State Adds Caste to Anti-Discrimination Policy in Ground*  
15 *Breaking Decision*, appearing in the L.A. Times on January 20, 2022, which is publicly  
16 available for viewing and downloading on the L.A. Times website. See  
17 [https://www.latimes.com/california/story/2022-01-20/csu-adds-caste-to-its-anti-](https://www.latimes.com/california/story/2022-01-20/csu-adds-caste-to-its-anti-discrimination-policy)  
18 *discrimination-policy*.

19       11. Attached hereto as **Exhibit J** is a true and correct copy of an email dated  
20 February 14, 2022, which was produced by Defendant in this case bearing Bates label  
21 CSU000936-000937.

22        12. I declare under penalty of perjury under the laws of the United States that  
23 the forgoing is true and correct.

24 || Executed this 12<sup>th</sup> day of September 2023.

/s/ Alberto M. Longo  
**Alberto M. Longo**